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BLUE SHIELD OF CALIFORNIA

THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, CENTRAL DIVISION

KENNETH P. and NATASIA P.,  Plaintiffs,  vs.  BLUE SHIELD OF CALIFORNIA,  Defendant.	Civil No. 2:18-cv-00034 BSJ  <b>REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF MOTION TO TRANSFER VENUE UNDER THE DOCTRINE OF <i>FORUM NON CONVENIENS</i></b>  Judge Bruce S. Jenkins
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**PLEASE TAKE NOTICE THAT** under Federal Rule of Evidence 201,  
Defendant California Physicians' Service dba Blue Shield of California ("Blue Shield")  
respectfully requests that the Court take judicial notice of Exhibits 1-3 in support of Blue  
Shield's Motion to Transfer Venue.

1. A printout of the California Secretary of State's website, establishing the principal place of business for California Physicians' Service, attached to the Declaration of Ketakee Kane ("Kane Decl.") as **Exhibit 1**.

2. A printout of the Utah Secretary of State's website, establishing that California Physicians' Service is not incorporated in Utah, attached to the Kane Decl. as **Exhibit 2**.

3. A printout of the Utah Insurance Department website, establishing that California Physicians' Service is not registered with the Utah Insurance Department, attached to the Kane Decl. as **Exhibit 3**.

Federal Rule of Evidence 201(b) provides that the Court may take judicial notice of a fact not subject to reasonable dispute that is either: (1) generally known within the territorial jurisdiction of the trial court; or (2) capable of accurate and ready determination by resort to sources whose accuracy cannot reasonably be questioned.

The Court may take judicial notice of **Exhibits 1- 3** because they are public records. The Court may take judicial notice of public records, including official government publications. *Clemmons v. Bohannon*, 956 F.2d 1523, 1532 n.2 (10th Cir. 1992); *Am. Bankers Ass'n v. Nat'l Credit Union Admin.*, 347 F. Supp. 2d 1061, 1067 (D. Utah 2004). Government websites are considered official government publications. *U.S. v. Iverson*, 818 F.3d 1015, 1022 (10th Cir. 2016); *Global BTG LLC v. Nat'l Air Cargo, Inc.*, 2011 WL 2572337, \*1 (C.D. Cal. June 29, 2011) (taking judicial notice of a print out of the California Secretary of State's website).

Blue Shield respectfully requests that the Court take judicial notice of Exhibits 1-3.

Dated: May 29, 2018

MANATT, PHELPS & PHILLIPS, LLP

By: /s/ Ketakee R. Kane

Ketakee R. Kane

Attorneys for Defendant

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